

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:19-cr- 00458-MO

v.

INDICTMENT

**JOHN L JACKSON, aka Nelly, and
DIANA PETROVIC,**

**18 U.S.C. §§ 1591(a)(1) and (b)(1)
18 U.S.C. §§ 1591(a)(2) and (b)(2)
18 U.S.C. §§ 2423(a) and (e)**

Defendants.

Forfeiture Allegations

THE GRAND JURY CHARGES:

COUNT 1

**(Sex Trafficking of a Child by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))**

Between on or about August 1, 2018, and September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Minor Victim 5 knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 5 to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

Indictment

COUNT 2
(Sex Trafficking of a Child)
(18 U.S.C. §§ 1591(a)(2) and (b)(2))

Between on or about August 1, 2018, and September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, benefit financially, by receiving anything of value, from participating in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining, by any means, Minor Victim 5, and did such acts knowing and in reckless disregard of the fact that Minor Victim 5 had not attained 18 years of age and that Minor Victim 5 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(2) and (b)(2).

COUNT 3
(Transportation of a Minor with Intent to Engage in Sexual Activity)
(18 U.S.C. §§ 2423(a) and (e))

Between on or about August 1, 2018, and September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, specifically, Minor Victim 5, in interstate commerce from the State of Oregon to the State of Washington, while having the intent that Minor Victim 5 engage in prostitution, in violation of Oregon Revised Statute §167.007;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

FIRST FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Counts 1 and 2, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18,

United States Code, Sections 1594(d) and (e), any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

SECOND FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Count 3, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations.

Dated: October 9, 2019

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



JENNIFER J. MARTIN
THOMAS S. RATCLIFFE
Assistant United States Attorneys
GLEN H. UJIFUSA, JR.
Special Assistant United States Attorney